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2 United States Attorney
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4 Assistant United States Attorney
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Las Vegas, Nevada 89101
(702) 388-6336

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

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9
10 UNITED STATES OF AMERICA,) **2:14-cr-332-JAD-VCF**
11)
12 Plaintiff,)
13 vs.)
14 EDWARD JAMESON PURRY II,)
15 Defendant.)
16 _____)

17 **UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING**

18 The United States of America, by and through DANIEL G. BOGDEN, United States
19 Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, hereby files a Motion to
20 Continue the Sentencing Hearing in the above-entitled manner, currently set for October 28,
21 2015, at 10:00 a.m., to a date and time convenient for this Court, but in no event earlier than
22 fourteen (14) days.

23 This motion is filed for the following reasons:

- 24 1. The Defendant filed a sentencing memorandum on September 28, 2015. *See*
25 Docket #112.
- 26 2. Based on the issues raised in the Defendant's sentencing memorandum, the
27 Government anticipates having to file a lengthy sentencing memorandum in response.

1 3. The Government needs more time to prepare its sentencing memorandum, taking
2 into account due diligence.

3 4. The Government has requested additional information that it needs in order to
4 establish the challenged sentencing enhancements, and is awaiting receipt of that information.

5 5. The Government also wants to ensure that the Court has sufficient time prior to
6 the sentencing hearing to review what the Government anticipates will be a lengthy sentencing
7 memorandum.

8 6. Additionally, the undersigned is preparing for trial in the matter of *United States*
9 *v. Michael Beale*, 2:15-cr-156-JAD-PAL, currently scheduled to commence on November 3,
10 2015.

11 7. Denial of this request for a continuance of the sentencing hearing could
12 potentially prejudice both parties.

13 8. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 9. This is the fourth stipulation filed herein to continue the sentencing hearing.

16 DATED: October 23, 2015.

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18 _____
19 /s/
20 PHILLIP N. SMITH, JR.
21 Assistant United States Attorney
22 Counsel for the United States
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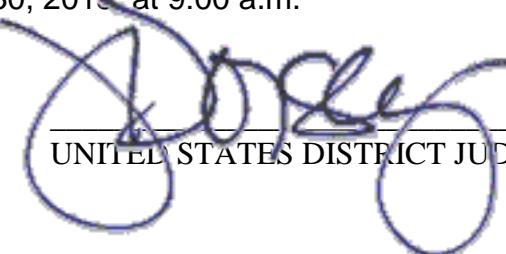
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2 UNITED STATES DISTRICT COURT
3 DISTRICT OF NEVADA

4 * * *

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6 UNITED STATES OF AMERICA,) **2:14-cr-332-JAD-VCF**
7)
8) **ORDER CONTINUING**
9) **SENTENCING HEARING**
10 Plaintiff,)
11 vs.)
12 EDWARD JAMESON PURRY II,)
13 Defendant.)
14 _____
15

16 **ORDER**

17 Based on the pending motion filed by counsel for the United States, and good cause
18 appearing therefore, **IT IS HEREBY ORDERED**, that the sentencing hearing in the above-
19 captioned matter, currently scheduled for October 28, 2015, at the hour of 10:00 a.m., be vacated
20 and continued to Monday, November 30, 2015, at 9:00 a.m.

21 
22 _____
23 UNITED STATES DISTRICT JUDGE

24 October 23, 2015
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